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December 20, 2022

Via ECF

The Honorable Valerie E. Caproni, U.S.D.J. United States District Court Southern District of New York 40 Foley Square New York, New York 10007

Re: Sarr v. Sinergia, Inc. et al.

Case No. 1:22-cv-03610 (VEC) (RWL)

Dear Judge Caproni:

We are counsel to Plaintiff in the above-captioned action and write in response to the Court's December 20, 2022 Order scheduling an in-person conference for tomorrow, December 21, 2022 at 3:00 p.m., for which both the undersigned and the Plaintiff, Ms. Sarr, are required to attend. For the reasons stated below, we respectfully request the Court briefly adjourn the conference to the next available Monday.

As my colleague Anne Seelig informed Chambers by email correspondence earlier today, I am actually engaged in depositions tomorrow, December 21, 2022 in connection with the arbitration *Mera v. Kyma NYC LLC d/b/a Kyma, et al.*, JAMS No. 5425000414. While I am generally available the two following days (Thursday, December 22, 2022 and Friday, December 23, 2022), my client, who has a special needs child, has informed my office that she has limited availability and requests the conference be adjourned to a Monday.

There have been no previous requests for adjournment of this conference. We reached out to Defendants' counsel to confirm whether they consent to the adjournment request, however, Mr. Pechman advised that Mr. Cuadra was in a deposition and could not respond until the next break.

We thank the Court for its kind consideration.

Respectfully submitted,

/s/ C.K. Lee C.K. Lee, Esq.

cc: all parties via ECF